COMMONWEALTH OF MASSACHUSETTS DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

FIRST SET OF INFORMATION REQUEST TO FITCHBURG GAS AND ELECTRIC LIGHT COMPANY D.T.E. 03-115

Pursuant to 220 C.M.R. 1.06(6)(c), The Department of Telecommunications and Energy ("Department") hereby submits to Fitchburg Gas and Electric Light Company ("Fitchburg" or "Company") the following first set of Information Requests.

INSTRUCTIONS

The following instructions apply to this set of Information Requests and all subsequent Information Requests issued by the Department to Fitchburg Gas and Electric Light Company in this proceeding.

- 1. "Fitchburg" or "Company" means Fitchburg Gas and Electric Light Company, its officers, directors, employees, consultants, and attorneys.
- 2. Each request should be answered in writing on a separate, three-hole punch page with a recitation of the request, a reference to the request number, the docket number of the case and the name of the person responsible for the answer.
- 3. Do not wait for all answers to be completed before supplying answers. Provide the answers as they are completed. Further, these requests shall be deemed continuing so as to require further supplemental responses if the or its witness receives or generates additional information within the scope of these requests between the time of the original response and the close of the record in this proceeding.
- 4. The term "provide complete and detailed documentation" means:
 - Provide all data, assumptions and calculations relied upon. Provide the source of and basis for all data and assumptions employed. Include all studies, reports and planning documents from which data, estimates or assumptions were drawn and support for how the data or assumptions were used in developing the projections or estimates. Provide and explain all supporting work-papers.
- 5. The term "document" is used in its broadest sense and includes, without limitation, writings, drawings, graphs, charts, photographs, phono-records, microfilm, microfiche, computer printouts, correspondence, handwritten notes, records or reports, bills, checks, articles from journals or other sources and other data compilations from which information can be obtained and all copies of such documents that bear notations or other markings that differentiate such copies from the original.

- 6. If any one of these requests is ambiguous, notify the Hearing Officer so that the request may be clarified prior to the preparation of a written response.
- 7. Please serve copies of the responses as follows: one (1) copy of the responses to Mary Cottrell, Secretary of the Department and on all parties; one (1) copy of the responses to Michael Killion, Hearing Officer; and (4) four copies of the responses to Jeff Hall, Rates and Revenue Requirements Division.

INFORMATION REQUESTS

Please provide the rate reduction for each rate class, <u>on average</u>, to demonstrate that each rate class will receive a 15 percent reduction under the rates Fitchburg proposes to go into effect on January 1, 2004. The Company should use billing determinants from D.T.E. 97-115/120 when performing this calculation. Please provide all workpapers and calculations that support your response.